

**St. Onge IP**

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September 21, 2020

**VIA ECF**

Honorable John G. Koeltl U.S.D.J.  
U.S. District Court for the Southern District of New York  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl St.  
New York, NY 10007-1312

*Conference scheduled for  
9/23/20 at 2<sup>30</sup> P.M. is canceled,  
so ordered,  
John G. Koeltl  
9/22/20 U.S.D.J.*

Re: *PDK Commercial Photographers, Ltd. v. GRI American European LLC*  
Case No. 1:20-cv-00057

Dear Judge Koeltl:

We represent the defendant, GRI American European LLC ("GRI"), in this action.

Pursuant to Your Honor's Individual Practices and Local Civil Rules, GRI submitted a pre-motion letter on September 1, 2020 regarding GRI's anticipated motion to compel production of licensing documents from the plaintiff, PDK Commercial Photographers, Ltd. ("PDK") and for sanctions. Your Honor granted the pre-motion conference, which is currently scheduled for September 23, 2020 at 2:30 p.m.

Since then, PDK has produced a number of documents relating to licensing of the photograph at issue. PDK's counsel, Richard Liebowitz, has represented in writing that the produced documents are **all** of the licensing documents in PDK's possession relating to the photograph at issue. In light of this representation and in reliance on the same, GRI withdraws its request for a pre-motion conference on its motion to compel. GRI reserves the right to renew its motion to address other discovery issues that may arise.

Respectfully submitted,

Tatyana Voloshchuk  
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c: Counsel of record (via ECF)

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